MEMO ENDORSED



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 02/07/2022

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

RAMY LOUIS

Senior Counsel

Phone: (212) 356-2386 Fax: (212) 356-3509

Email: rlouis@law.nyc.gov

GEORGIA M. PESTANA

Corporation Counsel

APPLICATION GRANTED: Defendant's deadline to respond to the complaint is hereby extended to March 14, 2022. The Initial Case Management Conference scheduled for Wednesday, March 9, 2022 at 10:00 a.m. is hereby rescheduled to Tuesday, April 12, 2022 at 11:00 a.m. in courtroom 17-D, United States Courthouse, 500 Pearl Street New York, NY 10007. APPLICATION GRANTED

BY ECF

Honorable Katherine H. Parker United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Hon. Katharine H. Parker, U.S.M.J. 1, 2022 02/07/2022

Kathauu H

Dewayne Richardson v. City of New York, et al.,

21-CV-5080 (PAE) (KHP)

Your Honor:

This office represents defendants City of New York ("City"), New York City Health and Hospitals Corporation ("H+H"), Carter, Harvey, and Perry (collectively "City Defendants"), in the above-referenced action. Defendant City writes to request that the Court 1) extend City Defendants' deadline to answer, move, or otherwise respond to the complaint, from February 14, 2022 to March 14, 2022, 2) sua sponte extend defendants Law, Sanchez, and Gozman's deadline to answer, move, or otherwise respond to the complaint, from February 14, 2022 to March 14, 2022, and 3) adjourn the initial case management conference until a date after all defendants have responded to the complaint. This is the fourth request for an extension of time to respond to the complaint and an adjournment of the initial case management conference. Plaintiff's counsel, Walter John Thompson, consents to the requests.

The case was recently transferred to the undersigned and the requested extension would allow the undersigned the time needed to become acquainted with the case and investigate

¹ A telephonic initial conference is scheduled for March 9, 2022 at 10:00AM. (See ECF No. 28.) Defendant City also requests a corresponding extension of time to file a Proposed Case Management Plan, until one week before the re-scheduled initial conference.

plaintiff's claims in order to properly respond to the allegations in the complaint, follow-up on any outstanding documents, and for this office to make legal representation determinations as to defendants Law, Sanchez, and Gozman, pursuant to General Municipal Law § 50-k.

Accordingly, defendant City respectfully requests that the Court 1) extend City Defendants' deadline to answer, move, or otherwise respond to the complaint to March 14, 2022, 2) sua sponte extend defendants Law, Sanchez, and Gozman's deadline to answer, move, or otherwise respond to the complaint to March 14, 2022, so that their defenses are not jeopardized while representation is being decided, and 3) adjourn the initial case management conference until a date after all defendants have responded to the complaint.

Thank you for your time and consideration of this matter.

Respectfully submitted,

Ramy Louis

Senior Counsel

Special Federal Litigation Division

Rangfame

BY ECF

Walter John Thompson, Esq. *Attorney for plaintiff*